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May 21, 2021

**VIA ECF**

The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

**RE: In re Search Warrant dated April 28, 2021, 21 Mag. 4591r (21 MC 00425)**

Dear Judge Oetken:

Victoria Toensing, by and through counsel, respectfully requests argument on the issues raised by Ms. Toensing's May 12, 2021 Letter to this Court and The Government's Reply in Support of its Request for a Special Master and Opposition to the Motions for Rudolph Giuliani and Victoria Toensing.

Undersigned counsel has conferred with the Government which does not object to this request.

Respectfully Submitted,  
**BROWN RUDNICK LLP**



Michael J. Bowe

Cc: Audrey Strauss, Esq. (United States Attorney for the Southern District of New York)  
Rebekah Donaleski, Esq. (Assistant United States Attorney)  
Nicolas Roos, Esq. (Assistant United States Attorney)  
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